

Exhibit 2 – QTI claim chart for SiriusXM

**U.S. Patent No. US 7,650,376 v. SiriusXM Holdings, Inc.**

## Exhibit 2 – QTI claim chart for SiriusXM

## 1. Claim Chart


Claim	Analysis
<p>[37.P] A computer readable storage medium or media encoded with one or more computer programs including instructions for effecting the provision of content over a network, comprising</p>	<p>SiriusXM Holdings Inc. (“Defendant”) makes, uses, sells and/or offers to sell a computer readable storage medium or media encoded with one or more computer programs including instructions for effecting the provision of content over a network.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Defendant provides SiriusXM Tour with 360L device (“a computer readable storage medium or media encoded with one or more computer programs”), that offers live satellite radio and on-demand streaming of digital media content, such as podcasts, songs, and news, to multiple users. Further, when a user requests to access a specific media content from SiriusXM (part of a network), it delivers the requested media content to the user. Therefore, it would be apparent to a person having ordinary skills in the art that SiriusXM comprises instructions for effecting the provision of content over a network.</p>  <p>Source: <a href="https://shop.siriusxm.com/SiriusXM-Tour-360L">https://shop.siriusxm.com/SiriusXM-Tour-360L</a></p>

Exhibit 2 – QTI claim chart for SiriusXM






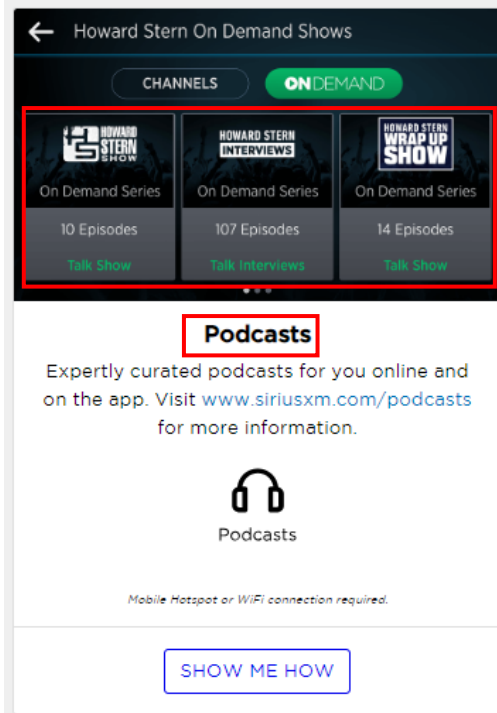
	<div><h2>SiriusXM Tour with 360L and Vehicle Kit</h2><p>Model # SXWB1V1</p><h3>MORE FEATURES </h3><p>Our exclusive <b>360L technology</b> combines satellite and streaming features, including personalization and access to the most SiriusXM channels.</p><div><ul style="list-style-type: none"><li> Voice Search &amp; Tuning</li><li> Bluetooth® Connectivity</li><li> Recommended for You</li></ul></div></div> <p>Source: <a href="https://shop.siriusxm.com/SiriusXM-Tour-360L">https://shop.siriusxm.com/SiriusXM-Tour-360L</a></p>
--	---

Exhibit 2 – QTI claim chart for SiriusXM

	<p><b>SUBSCRIPTION SOLD SEPARATELY:</b> Special subscription offer available with this radio. See <a href="#">DETAILS</a>.</p> <ul style="list-style-type: none"> <li>• <b>360L TECHNOLOGY:</b> Combines SiriusXM® satellite and streaming features together to transform your listening experience and give you 360 degrees of listening*.</li> <li>• <b>BLUETOOTH® AUDIO CONNECTIVITY:</b> Easily connect to your radio, home sound system, or a Bluetooth speaker with Bluetooth audio streaming.</li> <li>• <b>PANDORA STATIONS:</b> Create your own personalized Pandora Artist Stations. Pandora Stations access depends upon subscription plan and requires internet connectivity via a Wi-Fi connection.</li> <li>• <b>VOICE TUNING, SEARCH &amp; DISCOVERY:</b> Just speak into the built-in microphone to search for &amp; discover content, to tune channels, browse categories, and find games of your favorite sports teams*.</li> <li>• <b>SONG, ARTIST AND SPORTS ALERTS:</b> Get alerts when your favorite songs, artists and sports teams play on another channel. Access to sports alerts depends on subscription plan.</li> <li>• <b>DON'T MISS A MOMENT:</b> Pause, rewind and replay live satellite programming.</li> </ul> <p><small>*Access to Streaming content and certain features require internet connectivity via a Wi-Fi connection</small></p> <p>Source: <a href="https://shop.siriusxm.com/SiriusXM-Tour-360L">https://shop.siriusxm.com/SiriusXM-Tour-360L</a></p>
--	--

Exhibit 2 – QTI claim chart for SiriusXM



Source: <https://www.getsiriusxm.com/tour/tour-combo-offer.php>

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

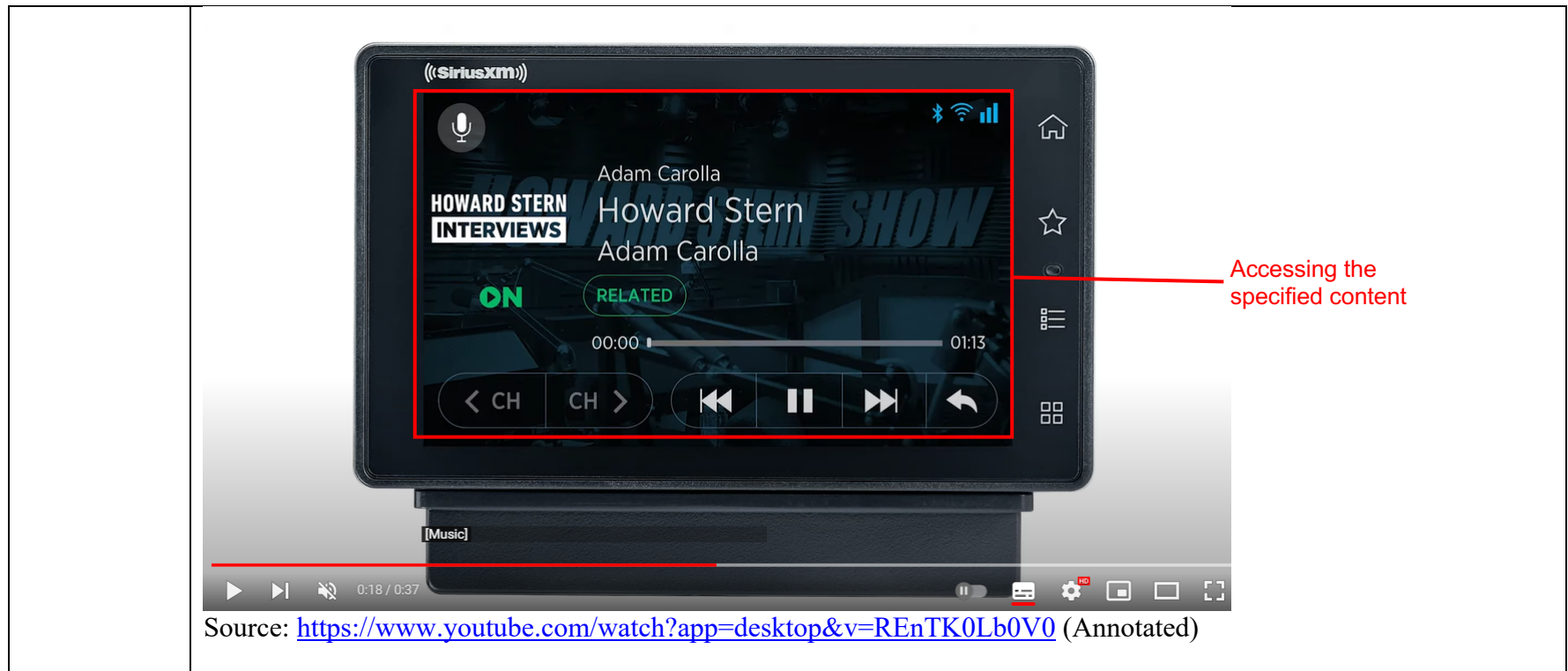
## Exhibit 2 – QTI claim chart for SiriusXM

<p>[37.1] instructions for receiving a request from a client for specified content</p>	<p>Defendant provide instructions for receiving a request from a client for specified content.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalent.</p> <p>For example, SiriusXM Tour with 360L allows the user (“client”) to select and listen (“request from a client”) to podcasts or songs (“specified content”) according to their subscription plan. Therefore, it would be apparent to a person having ordinary skills in the art that SiriusXM comprises instructions to receive a request from the user.</p> <div data-bbox="407 548 1667 1240"> <p>The screenshot shows the SiriusXM app interface. At the top, the SiriusXM logo is in a red box. Below it, a 'Related Content' section displays three items, each in a red box: 'HOWARD STERN HISTORY' (182 Episodes, Talk Special), 'HOWARD STERN INTERVIEWS' (222 Episodes, Talk Interview), and 'HOWARD STERN MUSIC' (246 Episodes, Performance). Red arrows point from these three boxes to the text 'Specified content' located below the screen. The bottom of the screen shows a video player interface with a progress bar at 0:13 / 0:37 and various control icons.</p> </div> <p>Source: <a href="https://www.youtube.com/watch?app=desktop&amp;v=REnTK0Lb0V0">https://www.youtube.com/watch?app=desktop&amp;v=REnTK0Lb0V0</a> (Annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.</p>
--	--

## Exhibit 2 – QTI claim chart for SiriusXM

<p>[37.2] instructions for communicati ng to the client the identity of a node server having the specified content stored thereon, thereby enabling the client to request transmission of the specified content from the node server; and</p>	<p>Defendant provides instructions for communicating to the client the identity of a node server having the specified content stored thereon, thereby enabling the client to request transmission of the specified content from the node server.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, after the user requests to access the specified media content, SiriusXM detects the user's geographical location and identifies a compatible server ("node server") (provided by multiple Content Delivery Networks such as Akamai, Amazon CloudFront, and Fastly (owners of node servers)) for delivering the requested content according to the policies such as content's availability in the geographical location. Since the requested content is delivered from the compatible server by the content delivery network to the user, upon information and belief, the identity of the compatible server is communicated and/or already known to the user in the process.</p> <p><b>c. For Customers Using Certain 360L Equipment; Your Relationship with the Wireless Service Provider:</b> Certain radios and equipment that receive our 360L service may be sold or provided with wireless Internet service by a telecommunications carrier arranged by us or by a third party, such as an automaker. Our "360L" service refers to the service we provide to radios utilizing a combination of our satellite network and a wireless Internetconnection. Certain features and/or content may not be available unless an active data connection is enabled in the vehicle or on the device. Content may vary between our Satellite and Streaming Services and by Plan.</p> <p>Source: <a href="https://www.siriusxm.com/customer-agreement">https://www.siriusxm.com/customer-agreement</a></p> <p><b>c. Streaming Service:</b> You may use the Streaming Service on one device at a time per Subscription or entitlement, unless otherwise provided. Any manipulation of the Service or "spoofing" of a web device or any other activities undertaken to deliver a false geographical location or any other false information to our servers is a violation of this Agreement. You are responsible for any costs associated with your Internet service.</p> <p>Source: <a href="https://www.siriusxm.com/customer-agreement">https://www.siriusxm.com/customer-agreement</a></p>
---	--

Exhibit 2 – QTI claim chart for SiriusXM





## Exhibit 2 – QTI claim chart for SiriusXM

<b>Web Hosting Providers</b>	<div data-bbox="401 282 821 354"> <a href="#">Amazon</a> used on a subdomain </div> <div data-bbox="821 282 1507 354"> Amazon is a US-based e-commerce and cloud computing provider. </div> <div data-bbox="401 370 821 441"> <a href="#">Microsoft</a> used on a subdomain </div> <div data-bbox="821 370 1507 441"> Microsoft is a multinational technology company headquartered in USA. </div> <div data-bbox="401 457 821 529"> <a href="#">Automattic</a> used on a subdomain </div> <div data-bbox="821 457 1507 529"> Automattic is hosting WordPress-based websites. </div> <div data-bbox="1010 529 1507 565"> hosting info partly based on data from <a href="#">ipinfo.io</a> </div>
<b>Data Center Providers</b>	<div data-bbox="401 607 821 678"> <a href="#">Amazon</a> used on a subdomain </div> <div data-bbox="821 607 1507 678"> Amazon is a US-based e-commerce and cloud computing provider. </div> <div data-bbox="401 695 821 766"> <a href="#">Microsoft</a> used on a subdomain </div> <div data-bbox="821 695 1507 766"> Microsoft is a multinational technology company headquartered in USA. </div> <div data-bbox="401 782 821 854"> <a href="#">Automattic</a> used on a subdomain </div> <div data-bbox="821 782 1507 854"> Automattic is hosting WordPress-based websites. </div> <div data-bbox="401 854 1507 889"> Source: <a href="https://w3techs.com/sites/info/siriusxm.com">https://w3techs.com/sites/info/siriusxm.com</a> </div> <div data-bbox="401 945 1507 1029"> The following page provides details on domains, networks, IPs, hosting services, and <b>content delivery networks used by SiriusXM.</b> </div> <div data-bbox="401 1068 1507 1104"> Source: <a href="https://www.netify.ai/resources/applications/siriusxm">https://www.netify.ai/resources/applications/siriusxm</a> </div>




## Exhibit 2 – QTI claim chart for SiriusXM










# CONTENT DELIVERY NETWORKS - CDNS

In order to get information to end users more quickly, many applications are distributed from multiple geographical points-of-presence (PoPs) using Content Delivery Networks (CDNs).



















Each PoP can host many IPs to deliver an application. A sample IP is provided.

Source: <https://www.netify.ai/resources/applications/siriusxm>

CDNs	# of IPs
 Akamai	4043
 Amazon CloudFront	1359
 Fastly	54

Service	Network	PoP	Location	Sample IP	IPs
 Fastly	 Fastly	Ashburn	 United States	146.75.31.42	1 IP
 Fastly	 Fastly	Atlanta	 United States	151.101.19.42	1 IP
 Fastly	 Fastly	Dallas	 United States	146.75.107.42	2 IPs

Source: <https://www.netify.ai/resources/applications/siriusxm>

 Amazon CloudFront	 Amazon CloudFront	Edge - Ashburn	 United States	3.162.103.93	36 IPs
 Amazon CloudFront	 Amazon CloudFront	Edge - Atlanta	 United States	3.161.136.47	8 IPs
 Amazon CloudFront	 Amazon CloudFront	Edge - Chicago	 United States	3.162.163.10	12 IPs
 Amazon CloudFront	 Amazon CloudFront	Edge - Dallas	 United States	13.225.47.32	25 IPs
 Amazon CloudFront	 Amazon CloudFront	Edge - Denver	 United States	108.156.201.21	3 IPs
 Amazon CloudFront	 Amazon CloudFront	Edge - Houston	 United States	13.249.59.4	12 IPs

Source: <https://www.netify.ai/resources/applications/siriusxm>

## Exhibit 2 – QTI claim chart for SiriusXM























			Dallas	 United States	96.16.22.150	22 IPs
			Edison	 United States	23.1.192.96	2 IPs
			El Segundo	 United States	23.72.90.147	3 IPs
			Englewood	 United States	23.37.109.228	1 IP
			Hillsboro	 United States	104.100.168.8	1 IP
			Houston	 United States	23.195.207.14	2 IPs
	Source: <a href="https://www.netify.ai/resources/applications/siriusxm">https://www.netify.ai/resources/applications/siriusxm</a>					
Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.						
[37.3] instructions for ascertaining that the node server transmitted the specified content to the client, wherein an owner of the node server is offered an incentive as compensation for transmission of the specified	<p>Defendant provides instructions for ascertaining that the node server transmitted the specified content to the client, wherein an owner of the node server is offered an incentive as compensation for transmission of the specified content to the client.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the compatible server (“node server”) delivers the requested media content (“specified content”) to the user (“client”) by using the content delivery network. Therefore, it would be apparent to a person having ordinary skills in the art that SiriusXM comprises instructions for ascertaining that the node server transmitted the specified content to the client.</p> <p>For example, SiriusXM offers subscription plans to users that allow the users to access the media content on demand. Upon information and belief, SiriusXM shares a part of the subscription fee with multiple Content Delivery Networks such as Akamai, Amazon CloudFront, and Fastly (owners of node servers) as an incentive to transmit the requested media content to the users.</p>					














































Exhibit 2 – QTI claim chart for SiriusXM

<p>content to the client.</p>	<div data-bbox="409 276 1570 922"><p>Accessing the specified content</p></div> <p>Source: <a href="https://www.youtube.com/watch?app=desktop&amp;v=REnTK0Lb0V0">https://www.youtube.com/watch?app=desktop&amp;v=REnTK0Lb0V0</a> (Annotated)</p>
-------------------------------	---

## Exhibit 2 – QTI claim chart for SiriusXM

<b>Web Hosting Providers</b>	<div> <div> Amazon used on a subdomain </div> <div> Amazon is a US-based e-commerce and cloud computing provider. </div> </div> <div> <div> Microsoft used on a subdomain </div> <div> Microsoft is a multinational technology company headquartered in USA. </div> </div> <div> <div> Automattic used on a subdomain </div> <div> Automattic is hosting WordPress-based websites. </div> </div> <div> <div> </div> <div> hosting info partly based on data from <a href="https://ipinfo.io">ipinfo.io</a> </div> </div>								
<b>Data Center Providers</b>	<div> <div> Amazon used on a subdomain </div> <div> Amazon is a US-based e-commerce and cloud computing provider. </div> </div> <div> <div> Microsoft used on a subdomain </div> <div> Microsoft is a multinational technology company headquartered in USA. </div> </div> <div> <div> Automattic used on a subdomain </div> <div> Automattic is hosting WordPress-based websites. </div> </div> <div> <div> </div> <div> Source: <a href="https://w3techs.com/sites/info/siriusxm.com">https://w3techs.com/sites/info/siriusxm.com</a> </div> </div>								
<b>CONTENT DELIVERY NETWORKS – CDNS</b>	<div> <p>In order to get information to end users more quickly, many applications are distributed from multiple geographical points-of-presence (PoPs) using Content Delivery Networks (CDNs).</p> <p>Each PoP can host many IPs to deliver an application. A sample IP is provided.</p> <p>Source: <a href="https://www.netify.ai/resources/applications/siriusxm">https://www.netify.ai/resources/applications/siriusxm</a></p> </div> <div> <table> <thead> <tr> <th>CDNs</th><th># of IPs</th></tr> </thead> <tbody> <tr> <td> Akamai</td><td>4043</td></tr> <tr> <td> Amazon CloudFront</td><td>1359</td></tr> <tr> <td> Fastly</td><td>54</td></tr> </tbody> </table> </div>	CDNs	# of IPs	 Akamai	4043	 Amazon CloudFront	1359	 Fastly	54
CDNs	# of IPs								
 Akamai	4043								
 Amazon CloudFront	1359								
 Fastly	54								

## Exhibit 2 – QTI claim chart for SiriusXM

Service	Network	PoP	Location	Sample IP	IPs
 Fastly	 Fastly	Ashburn	 United States	146.75.31.42	1 IP
 Fastly	 Fastly	Atlanta	 United States	151.101.19.42	1 IP
 Fastly	 Fastly	Dallas	 United States	146.75.107.42	2 IPs
Source: <a href="https://www.netify.ai/resources/applications/siriusxm">https://www.netify.ai/resources/applications/siriusxm</a>					
 Amazon CloudFront	 Amazon CloudFront	Edge - Ashburn	 United States	3.162.103.93	36 IPs
 Amazon CloudFront	 Amazon CloudFront	Edge - Atlanta	 United States	3.161.136.47	8 IPs
 Amazon CloudFront	 Amazon CloudFront	Edge - Chicago	 United States	3.162.163.10	12 IPs
 Amazon CloudFront	 Amazon CloudFront	Edge - Dallas	 United States	13.225.47.32	25 IPs
 Amazon CloudFront	 Amazon CloudFront	Edge - Denver	 United States	108.156.201.21	3 IPs
 Amazon CloudFront	 Amazon CloudFront	Edge - Houston	 United States	13.249.59.4	12 IPs
Source: <a href="https://www.netify.ai/resources/applications/siriusxm">https://www.netify.ai/resources/applications/siriusxm</a>					
 Akamai	 Akamai	Dallas	 United States	96.16.22.150	22 IPs
 Akamai	 Akamai	Edison	 United States	23.1.192.96	2 IPs
 Akamai	 Akamai	El Segundo	 United States	23.72.90.147	3 IPs
 Akamai	 Akamai	Englewood	 United States	23.37.109.228	1 IP
 Akamai	 Akamai	Hillsboro	 United States	104.100.168.8	1 IP
 Akamai	 Akamai	Houston	 United States	23.195.207.14	2 IPs
Source: <a href="https://www.netify.ai/resources/applications/siriusxm">https://www.netify.ai/resources/applications/siriusxm</a>					

## Exhibit 2 – QTI claim chart for SiriusXM

**SUBSCRIPTION SOLD SEPARATELY:** Special subscription offer available with this radio. See [DETAILS](#).

- **360L TECHNOLOGY:** Combines SiriusXM® satellite and streaming features together to transform your listening experience and give you 360 degrees of listening\*.
- **BLUETOOTH® AUDIO CONNECTIVITY:** Easily connect to your radio, home sound system, or a Bluetooth speaker with Bluetooth audio streaming.
- **PANDORA STATIONS:** Create your own personalized Pandora Artist Stations. Pandora Stations access depends upon subscription plan and requires internet connectivity via a Wi-Fi connection.
- **VOICE TUNING, SEARCH & DISCOVERY:** Just speak into the built-in microphone to search for & discover content, to tune channels, browse categories, and find games of your favorite sports teams\*.
- **SONG, ARTIST AND SPORTS ALERTS:** Get alerts when your favorite songs, artists and sports teams play on another channel. Access to sports alerts depends on subscription plan.
- **DON'T MISS A MOMENT:** Pause, rewind and replay live satellite programming.

\*Access to Streaming content and certain features require internet connectivity via a Wi-Fi connection

Source: <https://shop.siriusxm.com/SiriusXM-Tour-360L>



Source: <https://www.getsiriusxm.com/tour/tour-combo-offer.php>

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Defendant.

Exhibit 2 – QTI claim chart for SiriusXM

## 2. List of References

1. <https://shop.siriusxm.com/SiriusXM-Tour-360L>, last accessed on March 15, 2024.
2. <https://www.getsiriusxm.com/tour/tour-combo-offer.php>, last accessed on March 15, 2024.
3. <https://www.youtube.com/watch?app=desktop&v=REnTK0Lb0V0>, last accessed on March 15, 2024.
4. <https://www.siriusxm.com/customer-agreement>, last accessed on March 15, 2024.
5. <https://w3techs.com/sites/info/siriusxm.com>, last accessed on March 15, 2024.
6. <https://www.netify.ai/resources/applications/siriusxm>, last accessed on March 15, 2024.